

Peter Kmeto
Attorney at Law
State Bar #78827
P.O. Box 8789
South Lake Tahoe, CA 96158
Office (916)444-7420; Cell: (916) 768-6636
Email: pkmeto@sbcglobal.net

Attorneys for: TINU KHANNA

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. 2:22-CR-00213-KJM
)	
Plaintiff,)	STIPULATION AND
)	ORDER TO MODIFY
)	CONDITIONS OF
)	PRETRIAL RELEASE
)	
vs.)	
)	
TINU KHANNA (2),)	
Defendant.)	

Defendant, TINU KHANNA, hereby submits a Stipulation and Proposed Order for a one-time modification of his pretrial release conditions.

Stipulation and Grounds for Modification:

Defendant was released on or about December 27, 2023. Special Conditions pertinent to this request and stipulation are as follows:

5. You must restrict your travel to the District of New Jersey and the Eastern District of California (for Court purposes) unless otherwise approved in advance by the pretrial services officer. And,

14. You must adhere to a curfew and remain inside your residence every day from 6:00pm to 6:00am, or as adjusted by the pretrial services officer for medical, religious services, employment or Court-ordered obligations.

1 To date Defendant has been in compliance with all of his Special Conditions of
2 Release, which has been verified by the office of his District of New Jersey's Pretrial
3 Office and that office has no objection to the requested modification.

4
5 In celebration of the Christmas Season, his fiancé, Ms. Krishma Prashar, has
6 traveled from England, her country of residence, to belatedly celebrate Defendant's
7 birthday with him. It is their desire to be able to celebrate in the neighboring federal
8 district, viz., the Southern District of New York, this coming December 30 through
9 December 31, 2024 as well as have his curfew lifted for January 2nd, 2025 to facilitate
10 returning Ms. Prashar to Newark Liberty International Airport from which she will depart
11 for England on January 2, 2025.

12
13 The prosecutor in this case, AUSA Veronica Alegria has verified the above facts
14 and has no opposition to this one-time modification nor does Pretrial Services.

15 IT IS SO STIPULATED.

16 Dated: December 30, 2024 /s/ VERONICA ALEGRIA
17 VERONICA ALEGRIA
18 Assistant US Attorney
for the Government

19 Dated: December 30, 2024 /s/ PETER KMETO
20 PETER KMETO
21 Attorney for Defendant
TINU KHANNA

ORDER

UPON GOOD CAUSE SHOWN and the stipulation of the two parties IT IS ORDERED that Defendant TINU KHANNA's release conditions shall be modified to permit him to travel to the Southern District of New York from December 30th through December 31, 2024 and have his curfew lifted for January 2nd, 2025. All other conditions of release shall remain the same.

Dated: December 30, 2024

/s/ Allison Claire
Hon. Allison Claire
United States Magistrate Judge